

### REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 14, 2004. At the time of the Office Action, Claims 1-20 were pending in this Application. Claims 1-20 were rejected. Claims 8 and 14 have been amended to further define various features of Applicants' invention. Applicants respectfully request reconsideration and favorable action in this case.

#### **Rejections under 35 U.S.C. §112**

Claim 8 was rejected by the Examiner under 35 U.S.C. §112, first paragraph, for failing to comply with the written description requirement. Applicants have amended Claim 8 to overcome this rejection.

#### **Rejections under 35 U.S.C. §103**

Claims 1-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Background in the present specification in view of 6,039,581 issued to Mario DiMarco ("DiMarco"). Applicants respectfully traverse.

In order to establish a prima facie case of obviousness, the references cited by the Examiner must disclose all claimed limitations. In re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). Furthermore, according to § 2143 of the Manual of Patent Examining Procedure, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Applicants submit that the combination of Dimarco and the background of the present specification do not render Claims 1-20 obvious. Applicants note that the background of the present disclosure recites problems associated with D-style connectors, namely:

During the installation of D-style connectors, the connector pins and connectors themselves can become damaged if the mating connector is installed or attempted to be installed in an incorrect orientation such as an upside down orientation. Additionally damage to the connector can occur if the mating connector is misaligned or cocked with respect to the D-style connector. Damaged connectors or pins may lead to any number of different problems. Often, in order to correctly diagnose a problem related to a damaged connector or pin, a manufacturer must dispatch service personnel to a customer site. The cost of service personnel and replacement parts may impose significantly the cost to an information handling system manufacturer and may cause a user dissatisfaction and frustration until the problem is resolved.

See page 4.

Applicants submit that the “connector guides” disclosed by DiMarco and cited by Examiner would be looked to by one of ordinary skill as redundant or repetitive with respect to the connector body of a D-style connector. DiMarco discloses three embodiments (see Figs 3, 7, and 9). The embodiment shown in Figure 3 shows a three-sided “connector guide 20”; the embodiment shown in Figure 7 shows a connector guide 50 with “four walls”; and Figure 9 shows two three sided connector guides 60 on the shorter sides of the connector. Each of these embodiments reads on the connector body (shown in the present disclosure as element 42) of a D-style connector.

Applicants note that the connector guides taught by DiMarco suffer from the same problems a standard D-style connectors, as described above. Namely, with the connectors and connector guides taught by DiMarco, mating connectors may be brought together at an incorrect orientation--which may cause damage to the connector pins or the connector. The combination of DiMarco with a D-style connector would not yield a D-Style connector (which has a connector body) with an additional connector guide as claimed. Instead, such combination would yield a connector with a connector body that has a rectangular shape (as shown in Figure

7) or a connector with a partial connector body (as shown in Figures 3 and 7). Alternatively, the teaching of DiMarco may be seen as an initial application/incorporation of the connector body element of D-style connectors into the area of “orthogonal connection between circuit cards which are stacked in parallel” as described by DiMarco (Col. 1, lines 7-8). In either instance, there is clearly no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or to combine the references as suggested by the Examiner.

Additionally, Independent Claims 1, 14 and 17 include limitations that are not disclosed in either DiMarco or the background. For example, such limitations include, from Claim 1, “a connector guide disposed proximate the at least one D-style connector operable to **facilitate the proper orientation and alignment of a mating connector during installation thereof**”; from Claim 14, “**the attachment portions operable to interface with a first stud and a second stud disposed proximate the D-style connector**”; and from Claim 17 “disposing a connector guide proximate a D-style connector, **the connector guide preventing an inverted mating connector from interfacing with the D-style connector.**” Each of the limitations recited above specifically relates the connector guide element with a D-Style connector. Relating a connector guide to a D-style connector (which already possesses a connector body 42 akin to the “connector guides” of DiMarco as described above) is not taught by either DiMarco or by the background.

Accordingly, the combination of the background and DiMarco cannot render obvious Claims 1, 14 or 17. Applicants request that Examiner withdraw the rejection under §103 to Independent Claims 1, 14, and 17 and Claims 2-13, 15-16, and 18-20 which depend therefrom.

#### **Information Disclosure Statement**

Applicants would like to bring to the Examiner’s attention that Applicants filed an Information Disclosure Statement on December 4, 2003. Applicants respectfully request that the Information Disclosure Statement be considered and cited in the examination of the above-

referenced application. Applicants attach a copy of the Information Disclosure Statement and PTO Form 1449 filed December 4, 2003 for the Examiner's convenience along with a copy of the postcard receipt evidencing receipt by the Patent Office.

### CONCLUSION

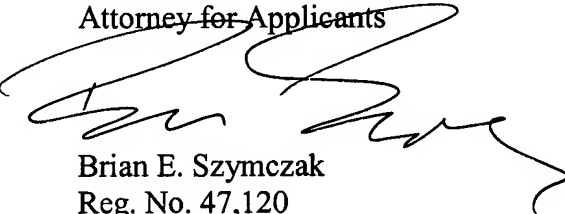
Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicants respectfully request reconsideration of Claims 1-20 as amended.

Applicants believe there are no fees due, however, the Commissioner is hereby authorized to charge any fees to Deposit Account No. 02-0383 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2548.

Respectfully submitted,

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